

1 Pursuant to Civil L.R. 7-11, Defendants hereby respectfully request that the Court
2 continue the hearing on Plaintiff Vilma Serralta's ("Plaintiff") Motion to Compel Further
3 Responses to Plaintiff's Second Set of Requests for Production of Documents and Plaintiff's First
4 Set of Special Interrogatories ("Motion to Compel"). The hearing on the Motion to Compel is
5 currently noticed for January 8, 2009.

6 This request for administrative relief is based on the following facts: (1) Defendants are
7 in the process of attempting to obtain the Court's consent to Wilson Sonsini Goodrich & Rosati's
8 ("WSGR") withdrawal as their counsel, (2) Defendants have begun the process of retaining
9 lower-cost successor counsel to represent them in this matter and do not authorize WSGR to
10 continue to represent them in this matter, and (3) Stephen Taeusch, who has handled discovery
11 matters for Defendants in this matter, will be on his honeymoon between the dates of November
12 28 and December 8, 2008.

13 On November 18, 2008, Defendants filed with this Court a Motion for Administrative
14 Relief to Approve Withdrawal of Counsel, which Plaintiff did not oppose. Notwithstanding, and
15 despite continuing meet and confer efforts to resolve outstanding discovery matters, on
16 November 24, 2008, Plaintiff filed the Motion to Compel and noticed the hearing date for
17 January 8, 2009. Plaintiff's counsel did not confer with Defendants' counsel as to the hearing
18 date selected.

19 On November 26, 2008, Stephen Taeusch met and conferred with Plaintiff's counsel and
20 requested that Plaintiff agree to continue the motion hearing. Plaintiff's counsel indicated that he
21 would need to discuss the matter with his associates, but that he was skeptical Plaintiff would
22 agree to a continuance. Plaintiff's counsel indicated that he might not be able to respond prior to
23 Mr. Taeusch's departure on his vacation. I informed Plaintiff's counsel by email on November
24 26, 2008, that, if Plaintiff had not agreed to a continuance or had not responded by Monday,
25 December 1, 2008, Defendants would bring the instant motion. Plaintiff's counsel replied that
26 Defendants should proceed with the understanding that Plaintiff is not willing to stipulate to a
27 continuance of the hearing on the Motion to Compel.
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1 While WSGR remains counsel of record for Defendants at this time, Defendants desire to
2 be represented by lower-cost counsel in this matter. WSGR therefore respectfully requests that
3 the Court continue the mandated court appearance while the Court considers Defendants' request
4 that WSGR be permitted to withdraw as their counsel in this matter. Such additional time will
5 permit successor counsel to enter an appearance, permit new counsel to familiarize itself with the
6 facts and legal issues of the instant case, and permit new counsel to address the outstanding
7 discovery issues or disputes with an eye toward resolving those disputes without the need of a
8 hearing or wasting judicial resources. An extension of twenty to thirty days will not prejudice
9 plaintiff's case or discovery efforts, and indeed will increase the likelihood of resolving the
10 disputes at issue in Plaintiff's motion.

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12 Dated: December 10, 2008

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
Ulrico S. Rosales (Bar No. 139809)
Stephen L. Taeusch (Bar No. 247708)

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20 *Attorneys for Defendants Sakhawat and Roomy Khan*

ORDER

Having reviewed and considered Defendants' Motion for Administrative Relief to Continue Hearing on Plaintiff's Motion to Compel Further Discovery Responses, and good cause appearing, the Court hereby continues the hearing on Plaintiff's Motion to Compel Further Responses to Plaintiff's Second Set of Requests for Production of Documents and Plaintiff's First Set of Special Interrogatories to January 15, 2009, at 2:00 p.m.

12/10
DATED: _____, 2008



Honorable Claudia Wilken
United States District Judge
Northern District of California